



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2006-055
Expiration Date: AUG - 9 2011
Installation ID: 510-1123
Project Number: 2005-01-025

Installation Name and Address

U.S. Ringbinder Corporation
6800 Arsenal
St. Louis, MO 63139
City of St. Louis

Parent Company's Name and Address

U.S. Ringbinder Corporation
6800 Arsenal
St. Louis, MO 63139

Installation Description:

U.S. Ringbinder Corporation designs and manufactures metal ringbinders. The operation mainly consists of custom orders. The facility is subject to MACT standards 40 CFR 63 Subpart T National Emission Standards for Halogenated Solvent Cleaning and 40 CFR 63 Subpart DDDDD National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is a Part 70 (major) source because its potential to emit exceeds major source levels for hazardous air pollutants (HAPs).

AUG 10 2006

Effective Date

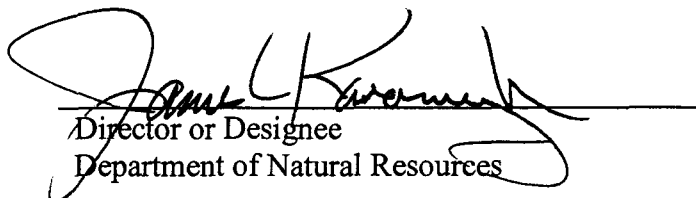

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

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Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)*
1999	0.01	0	0.18	12.61	0.14	0	12.60
2000	0.01	0	0.17	4.00	0.14	0	3.99
2001	0.01	0	0.18	5.61	0.14	0	5.60
2002	0.01	0	0.19	5.01	0.16	0	5.00
2003	0.01	0	0.18	4.31	0.15	0	4.30
2004	0.01	0	0.19	4.80	0.16	0	4.79

* Included in Volatile Organic Compounds

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	One (1) 2.207 MMBtu/hr Natural Gas Fired Boiler (Process Boiler)
EU0020	1967 Detrex 600 gal. conveyORIZED vapor degreaser
EU0030	Cold Cleaner

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Weil-McLain Gas Fired Boiler MbH – 2.396 Output 1.904 MMBtu

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) City of St. Louis Construction Permit No. 94-10-114

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

None

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 Process Boiler			
EU ID	EQ Reference # (Year)	General Description	Manufacturer/ Model#
EU0010	EP-1 (2004)	One (1) 2.207 MMBtu/hr Natural Gas Fired Boiler	Burnham/E-50

Permit Condition EU0010-001

10 CSR 10-6.060

Construction Permits Required

St. Louis City Construction Permit No. 94-10-114

Emission Limitation:

- 1) The boiler shall be as described in the permit application and is listed below:
Manufacturer: Burnham
Model Number: E-50(n.g)
Heat Input: 2.207 MMBtu/hr
- 2) The Boiler shall be installed in accordance with manufacturer's instructions and the permit application dated October 21, 1994.
- 3) The Boiler shall be operated in such a manner that the emissions from the stack will not exceed twenty percent (20%) opacity for a period in excess of six (6) minutes in any consecutive sixty (60) minute period.
- 4) The permittee shall only burn natural gas in this boiler.

Monitoring/Recordkeeping:

- 1) The permittee shall record natural gas consumption, annually, in units of cubic feet (See Attachment C).
- 2) Maintain the Boiler in good working condition and keep records of maintenance/preventive maintenance performed on the Boiler. (See Attachment B).
- 3) These records shall be made available to this agency and/or submitted annually.

Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13th Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition EU0010-002

10 CSR 10-5.030

Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter (PM) in excess of 0.40 lb/MMBtu.

Recordkeeping:

The permittee shall maintain the compliance calculations (see Attachment A) on-site at all times and available for inspection.

Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13th Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition EU0010-003

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds^{1,2}

Emission Limitation:

No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

[10 CSR 10-6.260(4) & 10 CSR 10-6.010 Ambient Air Quality Standards]

<u>Pollutant</u>	<u>Concentration by Volume</u>	<u>Remarks</u>
a) Sulfur Dioxide (SO ₂)	0.03 parts per million (ppm)	Annual arithmetic mean
	0.14 ppm (365 micrograms per cubic meter (µg/m ³))	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
b) Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
c) Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

¹ 10 CSR 10-6.260(3)(B) is a state-only requirement

² The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units would not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

Operational Limitation:

The emission unit shall be limited to burning pipeline grade natural gas.

Recordkeeping:

The permittee shall maintain an accurate record of the fuel used. Fuel purchase receipts analyzed samples or certifications that verify the fuel type will be acceptable.

Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13th Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0020 Vapor Degreaser			
EU ID	EIQ Reference # (Year)	General Description	Manufacturer/ Model#
EU0020	EP-2 (2003)	One Trichlorethylene 600 gallon conveyORIZED vapor degreaser	Detrex

Permit Condition EU0020-001

10 CSR 10-6.075

Maximum Achievable Control Technology Regulations

40 CFR Part 63, Subpart T

National Emission Standards for Halogenated Solvent Cleaning

40 CFR Part 63, Subpart A

General Provisions

Emission Limitation:

- 1) Complying with §63.464 – The permittee shall comply with the following requirements specified in §63.464(a)(1) . [§63.464(a)]
 - a) If the cleaning machine has a solvent/air interface, as defined in §63.461, the owner or operator shall comply with the requirements specified in §63.464(a)(1)(i) and (a)(1)(ii). [§63.464(a)(1)]
 - i. Maintain a log of solvent additions and deletions for each solvent-cleaning machine. [§63.464(a)(1)(i)]
 - ii. Ensure that the emissions from each solvent cleaning machine are equal to or less than the applicable emission limit listed below from Table 5 (Emission Limits for Batch Vapor and In-Line Solvent Cleaning Machines with a Solvent/Air Interface) of this subpart, listed below, using the procedures in §63.465(b) and (c). [§63.464(a)(1)(ii)]

Limits:
Batch vapor solvent cleaning machines: 3-month rolling average monthly emission limit of 150 kg/m² month.
Existing in-line solvent cleaning machines: 3-month rolling average monthly emission limit of 153 kg/m² month. New in-line solvent cleaning machines: 3-month rolling average monthly emission limit of 99 kg/m² month. (Table 5)
- 2) Complying with §63.464(a) – The permittee shall demonstrate compliance with the applicable 3-month rolling average monthly emission limit on a monthly basis as described in §63.465(b) and (c). [§63.464(b)]
- 3) If the applicable 3-month rolling average emission limit is not met, an exceedance has occurred. All exceedances shall be reported as required in §63.468(h). [§63.464(c)]

Test Methods:

- 1) Complying with §63.464 - The permittee shall on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in §63.465(c). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations. [§63.465(b)]
- 2) Complying with §63.464 - The permittee shall on the first operating day of the month comply with the following requirements: [§63.465(c)]
 - a) Using the record of all solvent additions and deletions for the previous monthly reporting period required under §63.464(a), determine solvent emissions (E_i) using equation 2 for cleaning machines with a solvent/air interface: [§63.465(c)(1)]

$$E_i = \frac{SA_i - LSR_i - SSR_i}{AREA_i} \quad (\text{Equation 2})$$

Where:

E_i = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i , (kg of solvent /m² of solvent/air interface area month)

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i , (kg of solvent/month)

LSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i , (kg of solvent/month)

SSR_i = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in §63.465(c)(2), during the most recent monthly reporting period i , (kg of solvent/month)

$AREA_i$ = the solvent/air interface area of the solvent cleaning machine (m²)

- b) Determine SSR_i using the method specified in §63.465(c)(2)(i) or (c)(2)(ii). [§63.465(c)(2)]
 - i. From tests conducted using EPA reference method 25d. [§63.465(c)(2)(i)]
 - ii. By engineering calculations included in the compliance report. [§63.465(c)(2)(ii)]
- c) Determine the monthly rolling average, EA , for the 3-month period ending with the most recent reporting period using equation 4 for cleaning machines with a solvent/air interface: [§63.465(c)(3)]

$$EA_i = \frac{\sum_{j=1}^3 E_i}{3} \quad (\text{Equation 4})$$

Where:

EA_i = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (kg of solvent /m² of solvent/air interface area month)

E_i = halogenated HAP solvent emissions for each month (j) for the most recent 3 monthly reporting periods (kg of solvent/m² of solvent/air interface area month)

$j=1$ = the most recent monthly reporting period

$j=2$ = the monthly reporting period immediately prior to $j=1$

$j=3$ = the monthly reporting period immediately prior to $j=2$

- 3) The permittee shall determine their potential to emit from all of the solvent cleaning operations, using the procedures described below. An installation's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the installation. [§63.465(e)]
 - a) Determine the potential to emit for each individual solvent cleaning using equation 6: [§63.465(e)(1)]

$$PTE_i = H_i \times W_i \times SAI_i \quad (\text{Equation 6})$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kg of solvent/year)

H_i = hours of operation for solvent cleaning machine i (hours/year)

= 8760 hours/year, unless otherwise restricted by a Federally enforceable requirement.

W_i = the working-mode uncontrolled emission rate ($\text{kg}/\text{m}^2 \text{ hour}$)

= $1.12 \text{ kg}/\text{m}^2 \text{ hour}$ for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (m^2). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in §63.465(e)(2).

- b) Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the installation. [§63.465(e)(3)]

Recordkeeping:

- 1) Complying with §63.464 – The permittee shall maintain records specified below in written or electronic form for a period of 5 years. [§63.467(c)]
- a) The dates and amounts of solvent that are added to the solvent cleaning machine. [§63.467(c)(1)]
 - b) The solvent composition of wastes removed from cleaning machines as determined using the procedure described in §63.465(c)(2). [§63.467(c)(2)]
 - c) Calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations. [§63.467(c)(3)]

Reporting:

- 1) Existing Solvent Cleaning Machine – The permittee shall submit an initial notification report to the Administrator no later than August 29, 1995. This report shall include the following information: [§63.468(a)]
- a) The name and address of the owner or operator. [§63.468(a)(1)]
 - b) The address (i.e., physical location) of the solvent cleaning machine(s). [§63.468(a)(2)]
 - c) A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls. [§63.468(a)(3)]
 - d) The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993. [§63.468(a)(4)]
 - e) The anticipated compliance approach for each solvent cleaning machine. [§63.468(a)(5)]
 - f) An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine. [§63.468(a)(6)]
- 2) Complying with the provisions of §63.464 – The permittee shall submit to the Administrator an initial statement of compliance for each solvent cleaning machine. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date specified in §63.460(d). The statement shall include the following information: [§63.468(e)]
- a) The name and address of the solvent cleaning machine owner or operator. [§63.468(e)(1)]
 - b) The address of the solvent cleaning machine(s). [§63.468(e)(2)]
 - c) The solvent/air interface area for each solvent cleaning machine. [§63.468(e)(3)]
 - d) The results of the first 3-month average emissions calculation. [§63.468(e)(4)]
- 3) Complying with the provisions of §63.464 – The permittee shall submit a solvent emission report every year. This solvent emission report shall contain the following information: [§63.468(g)]
- a) The size and type of each unit subject to this subpart (solvent/air interface area). [§63.468(g)(1)]
 - b) The average monthly solvent consumption for the solvent cleaning machine in kilograms per month. [§63.468(g)(2)]
 - c) The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in §63.465(c). [§63.468(g)(3)]
- 4) The permittee shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under §63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the

end of each calendar half or quarter, as appropriate. The exceedance report shall include the following information: [§63.468(h)]

- a) Information on the actions taken to comply with §63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. [§63.468(h)(1)]
 - b) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken. [§63.468(h)(2)]
 - c) If not exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. [§63.468(h)(3)]
- 5) An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met: [§63.468(i)]
- a) The source has demonstrated a full year of compliance without an exceedance. [§63.468(i)(1)]
 - b) The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified in subpart A (General Provisions) and this subpart. [§63.468(i)(2)]
 - c) The Administrator does not object to a reduced frequency of reporting for the affected source as provided in (e)(3)(iii) of subpart A (General Provisions). [§63.468(i)(3)]
- 6) An owner or operator of any other solvent cleaning machine subject to the provisions of this subpart is subject to title V permitting requirements.

Permit Condition EU0020-002

10 CSR 10-5.300

Control of Emissions From Solvent Metal Cleaning

Equipment Specifications:

Each conveyORIZED degreaser shall have:

- 1) A drying tunnel or rotating (tumbling) basket or other means demonstrated to have equal to or better control which shall be used to prevent cleaned parts from carrying out solvent liquid or vapor,
- 2) The following safety switches or equivalent safety devices approved by the director which operate if the machine malfunctions:
 - a) A vapor level safety thermostat with manual reset which shuts off the heating source when the vapor level rises just above the cooling or condensing coil,
 - b) A spray safety switch, which shuts off the spray pump if the vapor level in the spray chamber drops four inches (4"),
- 3) Entrances and exits shall silhouette work loads so that the average clearance between parts and the edge of the degreaser opening is less than four inches (4") or less than ten percent (10%) of the opening,
- 4) Covers shall be provided for closing off the entrance and exit during hours when the degreaser is not being used,
- 5) A permanent, conspicuous label summarizing the operating procedures shall be affixed to the equipment, and
- 6) The following control device must be present on the machine:
 - a) A refrigerated chiller.

Operation Limitation:

- 1) Each conveyORIZED degreaser shall be operated as follows:
 - a) Ventilation exhaust shall not exceed sixty-five cubic feet per minute per square foot of degreaser opening unless proof is submitted that it is necessary to meet Occupational Safety and Health Administration (OSHA) requirements.
 - b) Fans shall not be used near the degreaser opening.
 - c) Solvent carry-out shall be minimized in the following ways:
 - a. Parts shall be racked, if practical, to allow full drainage and
 - b. Vertical conveyor speed shall be maintained at less than eleven feet per minute (11 fpm).

- d) Whenever a conveyORIZED degreaser fails to perform within the operating parameters established for it by regulation, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established parameters.
 - e) Solvent leaks shall be repaired immediately or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - f) Water shall not be visually detectable in solvent exiting the water separator.
 - g) Covers shall be placed over entrances and exits immediately after conveyor and exhaust are shut down and removed just before they are started up.
 - h) Waste solvent shall be stored in covered containers only.
 - i) Any waste material removed from a vapor degreaser shall be disposed of by one (1) of the following methods and in accordance with the Missouri Hazardous Waste Management Commission rules codified at 10 CSR 10-25, as applicable:
 - a. Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste, or
 - b. Stored in closed containers for transfer to a contract reclamation service or a disposal facility approved by the director.
- 2) Operators must be trained as follows:
- a) Only persons trained in at least the operational and equipment requirements specified in this regulation for their particular solvent metal cleaning process shall be permitted to operate the equipment,
 - b) The supervisor of any person who operates a solvent metal cleaning process shall receive equal or greater operational training than the operator,
 - c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once each twelve (12) month period.

Monitoring

The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.

Recordkeeping:

- 1) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment E). The record also shall include maintenance and repair logs for both the degreaser and any associated control equipment (Attachments F).
- 2) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachments G).

Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13th Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0030 Cold Cleaner				
EU ID	EIQ Reference # (Year)	General Description	Solvent	Manufacturer/ Model#
EU0030	EP-4(2004)	One 100 gallon cold cleaner	Safety Kleen Premium	Safety Kleen/#81

Permit Condition EU0030-001

10 CSR 10-5.300

Control of Emissions From Solvent Metal Cleaning

Emission Limitation:

- 1) After September 30, 1998, no owner or operator shall operate a cold cleaner using a solvent with a vapor pressure greater than 2.0 mm Hg at 20 degrees Celsius.
- 2) After April 1, 2001, no owner or operator shall operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mm Hg at 20 degrees Celsius.
- 3) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The director must approve the alternative method.

Equipment Specifications:

- 1) Each cold cleaner shall be operated as follows:
 - a) A cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or
 - b) An enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into the enclosed reservoir.
 - c) When the solvent is agitated, the design of the cover shall be such that it can be easily operated with one (1) hand and without disturbing the solvent vapors in the tank. For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems.
 - d) Drainage facility which will be internal so that the parts are enclosed under the cover while draining.
 - e) If the internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
 - f) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.

Operation Limitation:

- 1) Each cold cleaner shall be operated as follows:
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
 - b) Clean parts shall be drained in the freeboard area for at least fifteen (15) seconds or until dripping ceases, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established for it by this regulation, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating procedures.
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired.
 - e) Any waste material removed from a cold cleaner shall be disposed of by one (1) of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable:

- a. Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste, or
 - b. Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director.
 - f) Waste solvent shall be stored in covered containers only.
- 2) Operators must be trained as follows:
- a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
 - b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and
 - c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every twelve-(12) month period.

Monitoring:

The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.

Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment D):
 - a) Name and address of the solvent supplier.
 - b) Date of purchase.
 - c) Type of solvent purchased.
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment E). The record also shall include maintenance and repair logs that occurred on the cold cleaner (Attachments F).
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment G).

Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13th Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, or to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.070 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices,

the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;

- b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt U.S. Ringbinder Corporation from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

St. Louis City Ordinance 65645, Sec 15 Open Burning Restrictions

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

This requirement is not federally enforceable.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions

from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.

- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the

following methods is presumptively credible evidence of whether a violation has occurred by a permittee:

- a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(5)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(5)(C)1.J Emissions Trading

None

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;

- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Paul Whaley, R & D Engineer. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. ATTACHMENTS

Attachments follow.

Attachment A

This table or an equivalent may be used to satisfy the maintenance/ preventative maintenance recordkeeping requirements for Permit Condition EU0010-002.

This table may be used to demonstrate compliance with 10 CSR 10-5.030 *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*.

The maximum allowable particulate ER for new sources, installed after 2/15/79, in an installation of individual heating sources with a heat input rate of less than 10 MMBtu per hour shall be 0.40 pounds PM per MMBtu of heat input. [10 CSR 10-5.030, Section (3)(B)1]

Natural Gas Burning Indirect Heating Units

Emission Unit	Heat Input (MMBtu/hr)	Maximum Hourly Design Rate (MMCF/hr)	PM Emission Factor* (lb/MMCF)	PM Potential Emission Rate (lb/MMBtu)	PM Allowable Emission Rate (lb/MMBtu/hr)	Unit in Compliance? (Yes/No)
Process Heater	2.21	0.0021	7.6	0.007	0.4	Yes
Building Heat	1.9	0.0023	7.6	0.009	0.4	Yes

*AP-42, Section 1.4 Natural Gas Combustion

Attachment B

Maintenance/Preventative Maintenance for Construction Permit 94-10-114

This table or an equivalent may be used to satisfy the maintenance/ preventative maintenance recordkeeping requirements for Permit Condition EU0010-001:

[illegible]

Attachment C

Annual Natural Gas Consumption Recordkeeping for Construction Permit 94-10-114

This table or an equivalent may be used to satisfy the annual natural gas consumption recordkeeping requirements for Permit Condition EU0010-001:

[illegible]

10 CSR 10-5.300 (Permit Condition EU0030-001)
Purchase Records for Cold Cleaning Solvent

[illegible]

Attachment E

10 CSR 10-5.300 (Permit Conditions EU0020-002 and EU0030-001)
Solvent Containing Waste Transfer Log

[illegible]

[illegible]

Attachment G

10 CSR 10-5.300 (Permit Conditions EU0020-002 and EU0030-001)

Employee Solvent Metal Cleaning Training Log

[illegible]

[illegible]

Attachment I

**40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
(Permit Condition EU0020-001)**

Overall Emissions Limit

Monthly Emissions Recordkeeping Form

Month/Year	SA	LSR	SSR	AREA	Monthly Emissions
	(1)	(2)	(3)	(4)	$\frac{(1) - [(2) + (3)]}{3}$

SA = Amount of halogenated solvent added (kilograms of solvent added [or pounds of solvent added]) that month.

LSR = Amount of halogenated solvent removed (kilograms of solvent removed [or pounds of solvent removed]) that month.

SSR = Amount of halogenated solvent removed from the cleaning machine in solid waste (kilograms of solvent removed [pounds of solvent removed] that month).

AREA = Amount of halogenated solvent removed from the machine in solid waste (kilograms of solvent removed [or pounds of solvent removed]).

Attachment J

**40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
(Permit Condition EU0020-001)**

Overall Emissions Limit

3-Month Rolling Average Monthly Emissions Recordkeeping Form

Month/Year	E_1	E_2	E_3	3-Month Rolling Average Monthly Emissions
				$\frac{[(E_1) + (E_2) + (E_3)]}{3}$

- E_1 = Monthly emissions (kilograms per square meter [or pounds per square foot]) for the most recent month.
- E_2 = Monthly emissions (kilograms per square meter [or pounds per square foot]) from the second most recent previous month.
- E_3 = Monthly emissions (kilograms per square meter [or pounds per square foot]) from the third most recent month.

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received 12/13/05;
- 2) 2004 Emissions Inventory Questionnaire, received 3-17-05;
- 3) 2003 Emissions Inventory Questionnaire, received 3-29-04;
- 4) 2002 Emissions Inventory Questionnaire, received 3-24-03;
- 5) 2001 Emissions Inventory Questionnaire, received 3-18-02;
- 6) 2000 Emissions Inventory Questionnaire, received 2-13-01;
- 7) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 8) City of St. Louis Source Registration for Cold Cleaners dated 06-15-99

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-5.030 *Maximum Allowable Emission Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

This rule applies because the installation operates two natural gas boilers, which qualify as indirect heating sources per 10 CSR 10-6.020, Section (2)(I)2.

10 CSR 10-5.300 *Control of Emissions From Solvent Metal Cleaning*

This rule does not exempt conveyorized degreasers if they are subject to any federal National Emission Standard for Hazardous Air Pollutants. Trichloroethylene is a hazardous air pollutant (HAP) and a volatile organic compound (VOC). Therefore, this rule was included as Permit Condition EU0020-001.

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*

This installation operates a Detrex 600 gal. conveyorized vapor degreaser, which uses trichloroethylene solvent. This unit is subject to 40 CFR Part 63, Subpart T. The provisions of Subpart T have been adopted by reference by Missouri Department of Natural Resources, APCP, into 10 CSR 10-6.075. Therefore, this installation is subject to the provisions as referenced in 10 CSR 10-6.075.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*

This installation operates two natural gas boilers. The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units would not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

Not Applicable

Construction Permit Revisions**10 CSR 10-5.110 *Restriction of Emission of Sulfur Dioxide for Use of Fuel***

This regulation was included in Construction Permit 94-10-114. This rule was rescinded on July 30, 1997 and has since been removed from the federally-approved SIP. For this reason, the regulation was not included for emission unit EU0010.

10 CSR 10-5.090, *Restriction of Emission of Visible Air Contaminants*

This regulation was included in Construction Permit 94-10-114 but does not appear in the Operating Permit because it was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. See other regulatory determinations for an explanation concerning the applicability of 10 CSR 10-6.220.

10 CSR 10-5.160, *Control of Odors in the Ambient Air*

This regulation was included in Construction Permit 94-10-114 but in the Operating Permit it was not applied on an emission unit specific level. This regulation is included in the Core Permit Requirements.

St. Louis City Ordinance 59270

This city ordinance was repealed in October 1999. The current city ordinance is 65645.

MACT Applicability**40 CFR Part 63, Subpart T *National Emission Standards for Halogenated Solvent Cleaning***

U.S. Ringbinder operates a Detrex 600 gallon conveyORIZED degreaser (EU0020), installed in 1967, using trichloroethylene as the solvent to degrease metal parts. This machine is subject to Subpart T according the applicability requirements as stated in the rule. The rule also covers "new, batch cold and batch vapor solvent cleaning machines." This permit represents only the "existing, in-line, vapor solvent cleaning machine", which is any solvent cleaning machine the construction or reconstruction of which was commenced on or before November 29, 1993 [40 CFR §63.461]. The vapor degreaser (EU0020) at this installation uses the overall emission limit for in-line vapor degreasers to comply with requirements of §63.464 as an alternative to the equipment requirements and work practice standards in §63.463. U.S. Ringbinder submitted an Initial Notification to EPA Region 7 in August 1995.

40 CFR Part 63, Subpart DDDDD *National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters*

U.S. Ringbinder operates one (1) 2.21 MMBtu and one (1) 1.9 MMBtu boiler, which are both subject to this subpart. They satisfy the definition of "existing small gaseous fuel unit" which is defined as "any firetube boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of curtailment or gas supply emergencies, and any boiler or process heater that burns gaseous fuels not combined with any sold fuels, burns liquefied fuel only during periods of gas curtailment or gas supply emergencies, and as a rated capacity of less than or equal to 10 MMBtu per hour"[40 CFR §63.7575]. Although these units are affected sources, under this subcategory these units "are not subject to the initial notification requirements in § 63.9(b) and are not subject to any requirements in this subpart or in subpart A of this part." [§63.7506(c)]

CAM Applicability

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

40 CFR Part 64 is not applicable to EU0010 or EU0020 because these units are subject to limitations and standards proposed by EPA after November 15, 1990 pursuant to Section 112 of the Clean Air Act [40 CFR §64.2 (b)(1)(i)]. This installation is subject to the provisions found in 40 CFR Part 63, Subparts T and DDDDD, which were both promulgated after November 15, 1990 per Section 112 of the Act.

EU0030 is not subject to 40 CFR Part 64 because this unit does not use a control device to achieve compliance with any emission limitation or standard.

Other Regulatory Determinations

10 CSR 10-5.300, Control of Emissions From Solvent Metal Cleaning

The cold cleaner (EU0030) at this installation complies with the vapor pressure requirements of this rule by using Safety Kleen Premium solvent with a vapor pressure of 0.2 mmHg at 20°C and 0.6 mmHg at 38.7°C. Due to the vapor pressure of the solvent used, the cold cleaner is not required to use any control devices that are required for cold cleaners that use a solvent that has a vapor pressure greater than 0.6 psi at 100 degrees F. Therefore, the control device requirements were not included in the operating permit. The cold cleaner at this installation are not used to clean spray guns or carburetors, so the requirements in this rule for those operations were not included in the operating permit. This cold cleaner agitates the solvent during the cleaning process, therefore, operating requirements for the cover were included in the operating permit. The cold cleaner also has internal drainage facilities, so the requirements in the rule for external drainage facilities were not included in the operating permit.

The vapor degreaser (EU0020) at this installation utilizes a refrigerated chiller as a control device. Because the degreaser uses a refrigerated chiller, the other control options for vapor degreasers in this rule were not included in the operating permit. The vapor degreaser at this installation does not utilize a solvent spray; therefore the requirements in 10 CSR 10-5.300 for machines with solvent sprays were not included in the operating permit.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

The monitoring schedule for this regulation starts with monthly observations because U.S. Ringbinder does not currently produce particulate matter (PM) in significant amounts capable of traveling beyond the premises of origin.

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

This rule is applicable to the installation, but based on a decision/agreement between EPA Region VII, Air Pollution Control Program Enforcement and Air Pollution Control Program Permitting, 10 CSR 10-6.220 is not being included in Title V permits for natural gas combustion units because by the nature of the fuel no opacity exceedances would ever be expected under normal operating conditions.

40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning

The vapor degreaser (EU0020) at this installation uses the overall emission limit for in-line vapor degreasers to comply with requirements of §63.464 as an alternative to the equipment requirements and work practice standards in §63.463. The subsequent records that are required to comply with §63.464 should be kept to show compliance with the emission limits. Recordkeeping forms for these recordkeeping requirements have been included in the operating permit. The vapor degreaser at this

installation has a solvent/air (S/A) interface, with this in mind the sections of this subpart that dealt with machines without a S/A interface were not included in the operating permit. The requirements for new cleaning units were not included in the operating permit, since the vapor degreaser at this installation is an existing unit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

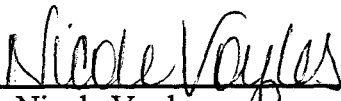
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Drafted by Phillip D. Saller, Air Pollution Engineer II
St. Louis City Air Pollution Control Program

Reviewed by:



Nicole Voyles
Environmental Engineer